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10 Attorneys for Plaintiff, Dawn Poole, Michael Cartwright, prospective Plaintiff  
11 G.M., a minor by her mother and guardian ad litem, Samantha Pierson

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 DAWN POOLE, individually as a  
15 Personal Representative of the Estate of  
16 JUSTIN CARTWRIGHT; MICHAEL  
17 CARTWRIGHT, individually as a  
18 Personal Representative of the Estate of  
19 JUSTIN CARTWRIGHT,

20 Plaintiff,

21 vs.

22 HEALTHRIGHT 360, a California  
23 Domestic Non-Profit organization and  
24 doing business as HEALTHRIGHT 360,  
25 HEALTHRIGHT 360 FOUNDATION, a  
26 California Domestic Non- Profit  
27 organization and doing business as  
28 HEALTHRIGHT 360; VITKA EISEN,  
individually and DOES 1 through 20,  
inclusive,

Defendants.

Case No.: 3:25-cv-03173-JCS

**DECLARATION OF JEFFREY  
MIKEL IN SUPPORT OF  
PLAINTIFF'S MOTION TO  
INTERVENE**

**DECLARATION OF JEFFREY MIKEL**

I, Jeffrey Mikel, declare as follows:

I am an attorney at law licensed to practice before this Court. I am an associate at the Sehat Law Firm, PLC, attorneys of record for Plaintiff in the above-referenced matter. I have personal knowledge of the matters set forth herein below and if called upon to testify will competently testify thereto. Attached hereto is the following exhibit:

Exhibit 1: Proposed First Amended Complaint for Damages

Dated: July 29, 2025

THE SEHAT LAW FIRM, PLC

/s/ Jeffrey Mikel

Attorney for Plaintiff